

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

WILL CO. LTD. a limited liability company
organized under the laws of Japan,

Plaintiff,

VS.

DOES 1-20, d/b/a AVGLE.COM,

Defendants.

Case No.: 3:20-cv-05666-RSL

**DECLARATION OF SPENCER
FREEMAN IN SUPPORT OF
PLAINTIFF'S *EX PARTE* MOTION
FOR EARLY DISCOVERY**

NOTE ON MOTION CALENDAR:
July 17, 2020

I, Spencer Freeman, under penalty of perjury, declare and state as follows:

1. I am an attorney at law licensed to practice before the Courts of the State of Washington, the United States District Court Western District of Washington, Eastern District of Washington, Ninth Circuit Court of Appeals, and United States Supreme Court. I am the principle attorney with the Freeman Law Firm, Inc., attorneys for Plaintiff Will Co. Ltd. Unless otherwise stated, I have personal knowledge of the facts contained herein this declaration and, if called and sworn as a witness, could and would competently testify thereto.

2. I sent emails to the following vendors associated with Mile High Glass Pipes, Inc. and Tucows Domains, Inc. I inquired whether they would honor my request for information without a subpoena. There has been no response from either.

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FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

3. In previous litigation, I have had direct contact with the following regarding production of information without a subpoena: GoDaddy.com, LLC; Domains By Proxy; Cloudflare, Inc.; PayPal, Inc.; Multi Media LLC; Tiger Media Broker; and Enom, Inc. Each of these entities clearly previously indicated that they would comply with a lawful subpoena (and have done so), but they could not produce any information without a subpoena.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Execute on the 17th day of July, 2020 at Tacoma, Washington.

/s/ Spencer D. Freeman
Spencer Freeman

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